



WEST KENTUCKY
RURAL TELEPHONE COOPERATIVE CORPORATION, INC.

You can have personal telecommunications.

December 9, 2008

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WT Docket Nos. 07-195 and 04-356
Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band

Dear Ms. Dortch:

West Kentucky Rural Telephone Cooperative, Inc is gravely concerned with the rules proposed in the *Further Notice* in the above-captioned proceeding. In essence, those rules adopt the business plan and technology choices of one company – M2Z – and would foreclose the use of this valuable spectrum by rural carriers like West Kentucky to deliver real wireless broadband to rural consumers in western Tennessee and Kentucky. We respectfully urge the Commission to adopt the asymmetric pairing plan proposed by T-Mobile and endorsed by numerous commenters, which would combine the AWS-3 band and the J Block to provide true broadband services, and to assign the licenses for this spectrum on a Cellular Market Area (“CMA”) basis.

As a rural telecommunications carrier in Tennessee and Kentucky, West Kentucky is committed to deploying wireless broadband to areas beyond the major metropolitan centers that often lack any broadband service. We are representative of the companies that have built out real telecommunications networks to consumers throughout rural America. Despite our experience in providing high-quality telecommunications services, however, we do not yet have sufficient spectrum to deploy 4G wireless broadband service. Consequently, we are very interested in the potential for using the AWS-3 band (2155-2175 MHz) and the J Block (2020-2025 MHz and 2175-2180 MHz) for wireless broadband.

We are concerned, however, about the current proposal for these spectrum bands, which is based on the speculative business plan of M2Z Networks. While this proposal has been billed as a “lifeline” service, it will not lead to universal broadband coverage or better broadband offerings in rural areas because the nationwide nature of the license will inevitably lead the winning bidder to ignore rural areas to meet the national buildout

benchmarks. This will lead to a focus on more densely populated urban and suburban areas first with rural areas waiting until the end of service deployment—if at all—before they see the service deployed. In addition, the proposed free “broadband” service is limited to a downstream transmission speed of 768 kbps. That is hardly high-speed broadband and is barely better than dial-up speeds today, much less five years from now.

Instead of creating service and auction rules designed around one company’s speculative business plan, the Commission should assign the licenses through CMAs using a band plan, like the one proposed by T-Mobile,¹ that allows for asymmetric pairing. Assigning the licenses on a CMA basis will ensure that no communities are left behind because the licensees in rural CMAs would be required to build out in those communities without the luxury of cherry-picking more densely populated areas to meet buildout requirements. In addition, licensing on a CMA basis will ensure that more companies, both established carriers and new entrants, will be interested in bidding on the spectrum at auction, facilitating competition and ensuring that the public is fully compensated for this valuable asset.

Asymmetric pairing will ensure that new entrants can use the spectrum to build new wireless broadband networks by combining the 20 MHz AWS-3 band with the 10 MHz J Block (both uplink and downlink) to support truly high-speed services that properly reflect the asymmetric nature of Internet usage.

We urge the Commission to take the concerns of rural consumers into consideration when developing options for the AWS-3 and J Block bands. Rural consumers will be best served by licenses assigned on a CMA basis and a band plan allowing for asymmetric pairing.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Bonnstetter', with a stylized flourish at the end.

Trevor R. Bonnstetter
Chief Executive Officer

¹ See Letter from Thomas J. Sugrue, T-Mobile, to Marlene H. Dortch, Secretary, FCC, WT Docket Nos. 07-195 and 04-356 (filed November 17, 2008).